

Exhibit 40

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

4 -----x
5 COALITION FOR TJ, :
6 Plaintiff, :
7 v. : Civil Action No.:
8 FAIRFAX COUNTY SCHOOL : 1:21-cv-00296-CMH-JFA
9 BOARD, :
10 Defendant. :

16 | Monday, October 18, 2021

17 | 9:02 a.m.

20 Job No.: 404859

21 | Pages: 1 - 207

22 | Reported by: Judith E. Bellinger, RPR, CRR

1 Deposition of ASRA NOMANI, held at the
2 offices of:

3
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14 Pursuant to notice, before Judith E.
15 Bellinger, Registered Professional Reporter,
16 Certified Realtime Reporter, and Notary Public in
17 and for the Commonwealth of Virginia.

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1 A P P E A R A N C E S

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Transcript of Asra Nomani, Designee
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22			

1 the coalition.

2 Q Have you identified for me all the
3 documents you reviewed in preparing for today's
4 deposition?

5 A I did.

6 MR. ROPER: Sona, are you talking about
7 outside document -- outside of documents that we
8 reviewed during our session?

9 MS. REWARI: Correct.

10 MR. ROPER: Okay.

11 Q What is the Coalition for TJ?

12 A So the Coalition for TJ is a grassroots
13 organization that we began in August 2020 amidst
14 great frustration amongst parents, community
15 members, alumni, and students, feeling that we had
16 been very much misrepresented in policy
17 discussions related to Thomas Jefferson High
18 School for Science and Technology.

19 We came together, just a few people,
20 and then others joined and we have become a very
21 strong advocacy group on behalf of merit and
22 excellence and diversity at TJ.

1 Q You said a small group of people.

2 Who were the original group of people?

3 A Well, we had a number of folks that
4 were parents that were part of the TJ community,
5 and, so, they saw, in June 2020, some disturbing
6 signals from the principal and started writing to
7 each other and to others; and those parents, then,
8 came together and created Coalition for TJ.

9 Q Who are those parents?

10 A So we have Yuyan Zhou, who came from
11 China in the 19 -- I'm not sure exactly when she
12 came, but she was a survivor of the Cultural
13 Revolution; we have Suparna Dutta, who immigrated
14 here from India with just dollars in her pocket;
15 we have Glenn Miller and his wife, Helen Miller,
16 who grew up with very modest means and have a son
17 at TJ; myself; and many others that became part of
18 our larger community.

19 Q Okay. Who, other than the four people
20 you've named, were amongst the group that founded
21 TJ -- Coalition for TJ?

22 A Well, we have a number of people. Do

1 you want me to name all of them?

2 Q Yes.

3 A We have Himanshu Verma, who is doing
4 the data science work; we have Srinivas, who is
5 working with the community.

6 Q Is that Mr. Akella?

7 A Yes, Mr. Akella. We have Julia
8 McCaskil, whose daughter was attending TJ; we have
9 Harry Jackson, who has emerged as a strong
10 advocate for support for African-American
11 students.

12 Q And did all these individuals,
13 together, found Coalition for TJ or was it a
14 different group of people?

15 A It was this group that were in the very
16 early days, yes.

17 Q So who made the decision to create the
18 coalition?

19 A The collective group.

20 Q The eight individuals that you named,
21 including yourself?

22 A Yeah. I mean, it was very informal

1 because that's how grassroots events happen,
2 right? So we had people come in -- come and go.
3 I wouldn't even say that it was eight individuals,
4 no, because, really, we had Zoom sessions in which
5 we would have these conversations expressing our
6 great frustration with the direction that Fairfax
7 County Public Schools and the Virginia Department
8 of Education was heading related to admissions to
9 TJ. So many people would pop in and out of those
10 meetings.

11 Q Can you pinpoint the date the coalition
12 was formed?

13 A Well, we were formed in August 2020,
14 and the date, I think it's in the declaration, I
15 guess, you know, it's very informal. And so, it's
16 not like we filed registration papers anywhere or
17 anything like that. It was a series of events.
18 We created a Facebook page and created a Twitter
19 page, we created a change.org petition. I don't
20 think you can really pinpoint it to one day.
21 We're a very organic creation.

22 Q Can you pinpoint it to a meeting at

1 which it was created?

2 A Not even, no.

3 Q Okay. And did you do anything to
4 formalize the creation of Coalition for TJ?

5 MR. ROPER: Objection to form.

6 THE WITNESS: I'm sorry, what did you
7 say?

8 MR. ROPER: Objection to the form of
9 the question.

10 You can answer the question.

11 A Okay. So can you repeat the question?

12 Q Sure. Did you do anything to formalize
13 the creation of the Coalition for TJ?

14 A So the most formal thing that we did to
15 institutionalize the formation of Coalition for TJ
16 was we created a Facebook page. You know, we are
17 all adults and we're all parents, very successful
18 professionals, most folks in their lives, so we
19 didn't need a hierarchy of a president, vice
20 president. We were a very horizontal organization
21 and very grassroots oriented.

22 Q And was the Facebook page an open page?

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1 A Yes.

2 Q It's a public page?

3 A Yes. So the Facebook page is a public
4 page. It is literally at Coalition for TJ. You
5 know, that's why it's difficult to say what day
6 did you begin. Because, first, we played with,
7 oh, Coalition and then number sign 4 and TJ, and
8 saw that was a little bit confusing for people.
9 So then we changed it to Coalition Four TJ, with
10 the number four spelled out. So these are all
11 public-facing pages. We were very intentional on
12 having complete transparency relating to our
13 communications with the policymakers.

14 Q Has the Coalition for TJ ever operated
15 under any other name?

16 A We have not operated under another
17 name.

18 Q Okay. And so, has this Coalition for
19 TJ sometimes been Coalition, the number 4, TJ and
20 then sometimes been Coalition For, with the word
21 F-O-R, TJ?

22 A Not really. I mean, it was just a

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1 handle on social media that it can be with a
2 number sign 4. It's just a handle, not a name.

3 Q Does the coalition have a charter?

4 A The coalition does not have a charter.

5 Q Does it have any Articles of
6 Incorporation?

7 A The Coalition for TJ does not have
8 Articles of Incorporation.

9 Q Is it registered with any federal
10 agency?

11 A We did not register with a federal
12 agency.

13 Q So that includes the IRS?

14 A That includes the IRS.

15 Q Is it registered with any Virginia
16 state agency?

17 A The Coalition for TJ is not registered
18 with a Virginia state agency.

19 Q So not registered with Virginia
20 Secretary of State, correct?

21 A We are not registered with the Virginia
22 Secretary of State.

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1 Q Is it registered with any
2 tax-collecting agency?

3 A It is not registered with a
4 tax-collecting agency.

5 Q Is it registered as a business in
6 Fairfax County?

7 A It is not a business.

8 Q Does it have any offices? Does the
9 coalition have any offices?

10 A No.

11 Q Does it have a mailing address?

12 A Well, the Coalition for TJ, initially,
13 was a grassroots organization without any
14 organizational entity. We became a program of a
15 fiscal sponsor named United Charitable. With that
16 fiscal sponsorship, we have a mailing address.

17 Q And I'll come back to that.

18 What is the mailing address for the
19 coalition?

20 A This was the mailing address for the
21 coalition. The -- I don't know what it is.

22 Q Oh. I'm sorry, when you say "This was

1 the mailing address," what are you referring to?

2 A The United Charitable fiscal
3 sponsorship had a mailing address.

4 Q Okay. So it was a United Charitable's
5 address that was the coalition's address for some
6 time?

7 A Yeah, you may not be familiar, but a
8 program has the mailing address of the fiscal
9 sponsor.

10 Q Okay. Yeah, I'm not familiar.

11 A Okay.

12 Q So I'm probably going to ask you a lot
13 of very basic questions about that.

14 A Sure, sure.

15 Q Because I'm not familiar with that.

16 Does the Coalition for TJ have an email
17 address?

18 A The Coalition for TJ does have an email
19 address.

20 Q And who has access to that account?

21 A The Coalition for TJ email address is
22 accessed by members of the leadership.

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1 Q What is the mailing -- excuse me. What
2 is the email address?

3 A The email address for Coalition for TJ
4 is coalitionfortj@gmail.com.

5 Q And who are the individuals that have
6 access to that account?

7 A I have access to
8 coalitionfortj@gmail.com, Suparna Dutta has access
9 to coalitionfortj@gmail.com, Srinivas Akella has
10 access.

11 Really, all of the members of our
12 co-leadership team have access to it. It's
13 very -- it's a collective email address.

14 Q How many individuals is that?

15 A I don't have a count of individuals.

16 Q More than five?

17 A Yes, more than five.

18 Q More than ten?

19 A More than ten, yes.

20 Q More than 20?

21 A Not more than 20.

22 Q Okay. So somewhere between 10 and 20.

1 A Yes.

2 Q Does the Coalition for TJ have a
3 website?

4 A Coalition for TJ does have a website.
5 Our website address is coalitionfortj.net. We
6 attempted to get coalitionfortj.com and .org but,
7 unfortunately, we discovered that another
8 organization named TJ Alumni Action Group had
9 purchased coalitionfortj.com and .org after our
10 public formation. So that was a very sad moment
11 for us, to see that an organization opposed to our
12 position would take the domain names of our
13 organization.

14 Q When did you learn that?

15 A We learned it, unfortunately, in the
16 weeks after we had created on our Facebook page,
17 as we were developing our website. We basically
18 went to try to register coalitionfortj.org and
19 found that it was taken, as well as
20 coalitionfortj.com. It was registered by a woman
21 named Renee Little, who is now president of TJ
22 Alumni Action Group.

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1 Q How did you learn that?

2 A We did something called a "WhoIs
3 search." And so with a WhoIs search, you can
4 basically put in any URL in a domain and so we
5 entered in coalitionfortj.com,
6 coalitionfortj.net -- I'm sorry --
7 coalitionfortj.org.

8 I'll just repeat that real quick. So
9 we entered, into the WhoIs search,
10 coalitionfortj.com and coalitionfortj.org and we
11 found, unfortunately, immediately, that there was
12 a registration by Renee Little and her company
13 that she had started with the address in Prince
14 William County, there was not, for example, a
15 private registration, even on this registration.
16 So we were very disheartened to see that an
17 organization that was opposed to our point of view
18 would do such a thing. We reached out to the TJ
19 Alumni Action Group but, unfortunately, they
20 refused to do the right thing and, you know,
21 release those domain names.

22 Q And then did you register

1 coalitionfortj.net?

2 A Yes, we did register
3 coalitionfortj.net.

4 Q Who owns that registration?

5 A So Suparna Dutta was the mother who
6 volunteered to register coalitionfortj.net. We
7 did it through GoDaddy.com, if I'm not mistaken.

8 Q Have you registered that name
9 Coalition, for TJ, with any agency?

10 A Yes. You know, unfortunately, after we
11 discovered that coalitionfortj.org and .com had
12 been taken by another organization, we then
13 learned that, you know, we could do this trademark
14 registration. And so I personally filed for a
15 trademark registration on Coalition for TJ dot --
16 just Coalition for TJ, and that registration has
17 been pending with the U.S. --

18 Q When did you file that?

19 A Filed it -- I filed for the
20 registration some months after we discovered that
21 the TJ Alumni Action Group was not going to give
22 us those domain names. And we recognized that in

1 order to make our case with the international
2 organization that governs URLs, that we would need
3 to try to do a trademark registration. So I
4 volunteered to do that registration with our
5 group. That's how we operate. We volunteer to do
6 things.

7 Q Was coalitionfortj.net created about
8 September 13, 2020?

9 A That sounds about right, yeah.

10 Q I think you had mentioned that the date
11 for the formation of the coalition is in your
12 declaration. So I'm going to mark this as
13 Exhibit 2.

14 (Coalition Exhibit 2 marked for
15 identification and attached to the transcript.)

16 Q The court reporter's just handed you
17 what we've marked as Exhibit 2.

18 Do you recognize this document?

19 A I do recognize Exhibit 2.

20 Q Okay. Go ahead and take a look through
21 it and tell me if, once you review this, you can
22 tell me the date that the Coalition for TJ was

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1 formed.

2 A So I can see that what we wrote was
3 August. It's line number 5, and it says in
4 August 2020, I cofounded the Coalition for TJ. So
5 that was the specificity for which we provided the
6 information.

7 Q Okay. And sitting here today, can you
8 give a date for which the coalition was formed?

9 A Well, for example, you can see on line
10 number 38 that "On August 14th, 2020, the
11 president of the TJ Alumni Action Group, Makya
12 Renee Little, and Mareta Corporation, a graphic
13 design company owned by Ms. Little, purchased the
14 URLs www.coalitionfortj.org,
15 www.coalitionfortj.com and www.coalition4tj.org,
16 with the number sign, as well as coalition4tj.com,
17 with the number sign, and had the websites
18 hyperlinked to her organization website,
19 tjalumniactiongroup.org."

20 On that date, I know this moment very
21 clearly, as I recollect it, as I recognize what
22 she had done that day because it was very

1 disturbing to me and very hurtful, actually. On
2 August 14th, 2020, the Associated Press wrote an
3 article about the Virginia Secretary of Education
4 writing new possible admission policies for TJ --
5 for Thomas Jefferson High School for science and
6 technology. And in that article, he identified
7 Coalition for TJ as an organization that had
8 emerged of parents and others who were advocating
9 for diversity and excellence at TJ. And so that
10 was sadly the moment, then, that Renee Little saw
11 our name, as did the rest of the world, as an
12 entity out there in the world representing the
13 amazing parents, students, alumni, and community
14 members that are with us, and that was the moment,
15 then, that she seized those domain names, because
16 we were now out there in the world.

17 Q And is it your testimony that as of
18 that date, you had alumni -- and I'm sorry, what
19 is it, parents, students, alumni, and community
20 members were already part of the Coalition for TJ
21 on that date?

22 A Yes.

1 Q Okay. So who were the alumni that were
2 part of the Coalition for TJ on that date?

3 A Well, I don't know about on that date
4 who, exactly, it was because we had so many people
5 writing to us.

6 Q Well, were they members on that date?

7 A Well, we don't have, you know, the kind
8 of, like, structure that you're talking about at
9 that date, uh-huh.

10 Q Well, were the alumni, that you just
11 alluded to, did you have any alumni members in
12 August 2020, the date you're referencing of this
13 article?

14 A Well, we don't -- would not use the
15 word "members" at that point, but we had alumni,
16 yes. And unfortunately, I'm hesitating right now
17 in speaking about it because, unfortunately, the
18 TJ Alumni Action Group, as you can tell from the
19 action that they took against us, has been very
20 aggressive and hostile to other fellow alumni that
21 dare to stand up for the positions that we
22 advocate. And so, really, as a sake of protecting

1 their own privacy, if you were to even ask me
2 right now, I couldn't name them because they are
3 afraid for their own reputations and their own
4 careers because of the backlash and the cancel
5 culture that they've had to face within their
6 community.

7 Q So there's a protective order in this
8 case and if you think this information is
9 confidential, your attorney can designate it
10 confidential under the protective order, but you
11 can't refuse to answer a question based on that
12 privacy concern. So I would direct -- I would ask
13 that if you have alumni that were members, and you
14 just testified that at the time of this article,
15 you had alumni in the TJ -- Coalition for TJ, and
16 my question is, who were the alumni that were in
17 the Coalition for TJ as of that date?

18 A You know what, she actually hasn't been
19 involved in recent months so I can't remember her
20 name, quite honestly.

21 Q So it was one person?

22 A Yeah.

1 Q Did the Coalition for TJ have any
2 members --

3 A Well --

4 Q -- as of this date of August 2020?

5 A We were, like I said, a very informal
6 organization.

7 Q And so, did there come a time that the
8 Coalition for TJ formalized its membership?

9 MR. ROPER: Objection to form.

10 A So we ended up, because of a need to,
11 you know, communicate with our community, creating
12 a WhatsApp group and then a Telegram group, and so
13 we created a form in which community members,
14 parents, alumni, students -- not students, because
15 we actually did not want to include students and
16 minor children in the Telegram group. But we had
17 a form which they could fill out so that they
18 could join our community.

19 Q And has that form ever changed?

20 A No.

21 Q And so, is the form that's on the
22 website, currently, the same form that's been used

1 throughout --

2 A Yes.

3 Q -- the Coalition for TJ's existence?

4 A Yes.

5 MR. ROPER: Just a reminder to let her
6 finish asking her question before you respond.

7 THE WITNESS: Sure. I was just moving
8 that.

9 MS. REWARI: Thank you.

10 Q Does the Coalition for TJ have a
11 mission?

12 A Yes. We have a very important mission;
13 the Coalition for TJ mission is to advocate for
14 diversity and excellence at Thomas Jefferson High
15 School for Science and Technology.

16 Q Is that mission stated in writing
17 anywhere?

18 A The mission is stated on our website.

19 Q What page on your website?

20 A The mission should be on our home page.

21 Q Is it anywhere in any particular tab on
22 your home page? Where would one find it, that

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1 went to your home page?

2 A Home page is a home page. There are no
3 tabs on home pages.

4 Q I'm going to show you. Is this the
5 home page, coalitionfortj.org?

6 A The home page goes -- is the entire
7 page.

8 Q Sure. Okay. Very cute picture of
9 Mr. Stefany's daughter.

10 So can you direct me to where, on your
11 website, one would find your mission statement?

12 A Do you want me to touch it or --

13 Q Sure.

14 A -- or do you want me to...

15 Q Well, here, you can see the tabs up
16 here.

17 A So, you know, you can see, like -- can
18 I take this?

19 Q Yeah, go ahead.

20 A Let me search this.

21 Q Okay.

22 A So the court reporter will note that I

1 went to our coalitionfortj.net website. I put in
2 the search words "diversity," and I found, on our
3 home page, the tab -- not the tab, I'm sorry, the
4 box that says "We love TJ. We are parents,
5 students and community members advocating for
6 diversity and excellence at Thomas Jefferson High
7 School for Science and Technology. We support
8 increasing diversity through merit-based
9 admissions to TJ."

10 Q Okay. So is that the -- that's the
11 mission statement on the website?

12 A And so that's on one box.

13 And then on the far right, it will be
14 noted that I'm reading, now, from a box that
15 states "Our Mission."

16 "Advocate for diversity and excellence
17 at Thomas Jefferson High School for Science and
18 Technology."

19 MR. STEFANY: Thank you.

20 THE WITNESS: Sure, thank you.

21 Q Thank you. When was this mission
22 adopted; do you know?

1 A This mission was adopted immediately
2 upon our organizing as a group, in August 2020.

3 Q In August 2020, okay. And has that
4 mission ever changed?

5 A No. The mission has remained
6 consistent.

7 Q What does it mean to advocate for
8 diversity and excellence?

9 A So, as is evidenced on our website, the
10 idea of advocating for diversity and excellence at
11 Thomas Jefferson High School means, for example,
12 speaking to school board members, speaking to the
13 media, writing up ads and letters to the editor,
14 doing data analysis to determine ways that we can
15 best increase the diversity of underrepresented
16 communities at the school and, you know, I will
17 note that we are an organization that is largely
18 immigrant and largely from Asia. Many of our
19 members come from totalitarian regimes, in which
20 they do not know how to even advocate to public
21 policy officials because they were never invited
22 to do so as citizens of their countries.

1 So in this country, then, we had a very
2 special role to help our community members know
3 how to even send an email to a school board
4 member; how to even sign up to register to speak
5 for three minutes at school board meetings. And
6 realize that, in America, they could stand up
7 without retribution or retaliation or risk of jail
8 or even death.

9 And so, I'm just saying that, also,
10 because I think for a lot of people in this
11 country, they might not recognize how strong that
12 word is, to be able to advocate, because we take
13 it for granted. But for so many of our own
14 members, this is a right that they never knew that
15 they were entitled to express.

16 Q How does the Coalition for TJ define
17 diversity?

18 MR. ROPER: Objection to form. And
19 objection that it calls for a legal opinion.

20 Q You can answer.

21 A So we see diversity in the community
22 that we are. We have so many amazing families

1 from around the world, from Eastern Europe to Asia
2 to nations in Africa and South America. We have
3 regional diversity of families that have come
4 around the country to call Fairfax County home.

5 So as you may likely be aware, we have
6 80 percent of our community of students that are
7 minority students.

8 Q Can I just interrupt? When you say
9 "we," are you talking about we, the coalition, or
10 we, Northern Virginia, or is there some other
11 definition you're using for "we"?

12 A Sure. So as you're aware, Thomas
13 Jefferson High School for Science and Technology
14 has 80 percent minority students. So 70 percent
15 of those students are from Asia and 10 percent
16 have been Black, Hispanic, and Multiracial
17 students, and about 20 percent have been White.

18 So that is one form of diversity. And
19 we recognize, also, that another expression of
20 diversity that we want to support and we do
21 support is those communities that are from the
22 Black and Hispanic communities that have had less

1 representation at TJ.

2 Q So when you say you advocate for
3 increasing diversity at TJ, what --

4 A We don't say that. I'm sorry, you
5 misquoted me.

6 Q You said, "We support increasing
7 diversity."

8 MR. ROPER: Objection to form in that
9 it misstates prior testimony.

10 Q You don't support --

11 A I said that we advocate for diversity
12 and excellence. I don't know if I misspoke or
13 you've misspoken it.

14 Q I'm reading from your website. It says
15 "We support increasing diversity through
16 merit-based admissions to TJ."

17 A Yeah. So that's a different statement
18 than what you were saying.

19 Q So tell me how you -- what increase
20 diversity you support.

21 A So we recognize that there has been a
22 failure, by Fairfax County Public Schools, to

1 appropriately, you know, pair students from Black
2 and Hispanic communities to gain admissions to TJ.
3 So our advocacy is to help improve that pipeline
4 to TJ of those communities.

5 Q So do you support increasing the
6 representation of Black and Hispanic students at
7 TJ?

8 MR. ROPER: Objection to form.

9 A So if you recall, the sentence that was
10 stated is that we support increasing diversity
11 through merit-based admissions.

12 Q Okay. Increasing -- and when you say
13 "increasing diversity through merit-based
14 admissions," my question is, do you support
15 increasing the representation of Black and
16 Hispanic students of merit at TJ?

17 MR. ROPER: Objection to form. Asked
18 and answered.

19 Q You can answer.

20 A We all support increasing the diversity
21 of Black and Hispanic students at TJ through
22 merit-based admissions.

1 Q Okay. Does the Coalition for TJ have
2 any officers?

3 A We are a horizontal organization and,
4 so, as you may well be aware, there's different
5 management styles and organizational structures
6 that are possible. As stated earlier, we're all
7 working adults in professions where we have plenty
8 of responsibilities. And so we knew early on that
9 we didn't need to add title to our names in order
10 to have a hierarchy within the organization. So
11 we're a very horizontal organization. We have
12 people who have emerged to be leaders within our
13 organization, but we do not have titles that are
14 traditional in organizational structures, like
15 president, vice president, secretary.

16 Q Does the Coalition for TJ have any
17 bylaws?

18 A We do not have bylaws.

19 Q What are the rules for governance of
20 the Coalition for TJ, or are there any?

21 A Well, we have the rules of civil
22 discourse, essentially, and democracy. You know,

1 built out of common sense.

2 Q And who determines whether the group
3 has reached a point of consensus to do something?

4 A It's really a decision that is made
5 collectively. I mean, you could -- you could
6 argue that the consensus means that everybody is
7 on board with that decision because we have come
8 to a compromise that everybody is agreeable with.
9 So, you know, I won't say that it's unanimous,
10 because there's not a vote that is taken, so I
11 couldn't, you know, assign unanimity to it.

12 It's something that we make sure that,
13 you know, everybody is comfortable with the
14 decision.

15 Q Have there been any decisions made by
16 the coalition where you took a vote?

17 A I really can't recall any that we took
18 a vote.

19 Q Okay.

20 (Coalition Exhibit 3 marked for
21 identification and attached to the transcript.)

22 Q The court reporter's just handed you a

1 A Yeah.

2 Q So if I understood your testimony
3 earlier, you can't think of a decision that was
4 made by vote for the coalition. Is that still
5 accurate?

6 A Yeah. I mean, this is a really good
7 example of where, you know, you kind of put your,
8 you know, planning document on paper, like you're
9 going to take a majority vote. But in reality,
10 being the adults and volunteers that we were, we
11 came to this agreeable consensus and wouldn't take
12 a formal vote on decision-making.

13 Q Okay.

14 A So majority vote became very
15 metaphorical, sort of in the idea that we wanted
16 to make sure that everybody on this list was good
17 with the plan.

18 Q So how were the leadership team members
19 selected?

20 A Well, what's so beautiful about our
21 activity and, you know, having been a journalist
22 for 30 years, I've seen many types of

1 organizations out there in the world. I've seen
2 organizations that are very astro turf and, you
3 know, created by entities, and this was such a
4 beautiful emersion of parents who had seen, you
5 know, their students and their, you know, sort of
6 friends of their -- of their children just excel
7 through the education that we had at TJ, and they
8 really wanted to try to make sure that we could
9 continue the spirit of TJ.

10 And so what happened is that parents
11 just volunteered among this group. They just
12 self -- they just raised their hands,
13 self-nominated to be leaders in our organization.
14 And these are folks with busy lives with both
15 their children and work, and they just decided to
16 volunteer.

17 Q So fair to say they were not elected by
18 the members of the Coalition for TJ?

19 A Yeah. That's what's really beautiful
20 about it is that they were volunteers that emerged
21 as leaders.

22 Q And are all the individuals that are

1 identified as members of the leadership team, are
2 they all -- were they all parents of TJ students
3 at the time?

4 MR. ROPER: Objection to form.

5 At what time?

6 MS. REWARI: At the time that this
7 leadership team was created.

8 A No, they were not.

9 Q Okay. So which of these individuals
10 did not have a student -- a child at TJ, at the
11 time that this leadership team was created?

12 A So the parents with children currently
13 at TJ from our leadership team was myself, Asra
14 Nomani, Suparna Dutta, Harry Jackson was a
15 freshman parent, Glenn Miller, Helen Miller,
16 Himanshu Verma. Yuyan Zhou is the mother who had
17 come here from China, after surviving the cultural
18 revolution, and she had just spent eight years as
19 a parent at TJ, her daughter had just graduated
20 the year before. So she was an alumni parent.

21 Q Did she have any children who were
22 eligible to apply to TJ?

1 A She did not have any children eligible
2 to apply to TJ. So Yuhan Zhou is, in fact, the
3 writer of the words that I read earlier from our
4 website that said "We love TJ." Because she is a
5 mom who volunteered day in and day out with the
6 parent teacher association and her children just
7 so benefited from the environment that was TJ, in
8 that she wanted to make sure that, out of her love
9 for TJ, that she could stand up for the school
10 that gave her students so much.

11 Q And you, Ms. Nomani, do you currently
12 have any children at TJ?

13 A So my son graduated from TJ in the
14 Class of 2021.

15 Q And do you have any children who are
16 eligible to apply to TJ or will be eligible to
17 apply to TJ in the future?

18 MR. ROPER: Objection. Form.

19 A I do not have any children that are
20 eligible to apply to TJ. I only have one son.
21 And I've continued to remain active in the
22 Coalition for TJ because having been the

1 beneficiary of America's education system for my
2 son and having seen him thrive at TJ, I feel it is
3 my responsibility now to advocate on behalf of so
4 many other families.

5 Q And what about Ms. Dutta? Does she
6 have children who attend TJ?

7 A So Suparna Dutta is the mother that I
8 spoke about earlier, who arrived in America with
9 just dollars in her pocket to get her education in
10 the United States. Her son attended Thomas
11 Jefferson High School for Science and Technology.
12 He was thriving at TJ. But, unfortunately,
13 Ms. Dutta felt that the environment at TJ had
14 become so hostile to her son that she just
15 disenrolled him from Fairfax County Public Schools
16 and has moved him to another school.

17 Q Okay. Does she have any children who
18 are not high school students?

19 A So Suparna Dutta does not have any
20 other students that are high school students. She
21 is continuing to advocate on behalf of Coalition
22 for TJ because America has this concept of the

1 American dream that she came here to embrace, and
2 that is what she is advocating to defend in the
3 United States of America now.

4 Q Okay. What about Harry Jackson? Does
5 he have any children who are going to be -- well,
6 strike that.

7 Does Harry Jackson have any children in
8 grades K through 8?

9 A Harry Jackson has children grades K
10 through 8, yes.

11 Q What about Glenn Miller? Does he have
12 any children grades K through 8?

13 A Glenn Miller does not have any children
14 K through 8.

15 Q What about Helen Miller?

16 A Helen Miller does not have children in
17 grades K through 8.

18 Q Himanshu Verma?

19 A I believe Himanshu Verma has children
20 grades K through 8, but I'm not certain.

21 Q What grade is -- are Harry Jackson's
22 children in?

1 MR. ROPER: So, is this -- which topic
2 are we on, Sona? We're getting into a lot of
3 details that are not necessarily part of the
4 30(b)(6).

5 MS. REWARI: Leadership team members.

6 MR. ROPER: But that doesn't say --

7 THE WITNESS: Yeah --

8 MR. ROPER: -- including demographic
9 information on all of the families.

10 MS. REWARI: Well --

11 MR. ROPER: I think you're just getting
12 a little beyond what a 30(b)(6) witness can be
13 prepared to address.

14 MS. REWARI: Well, if she can address
15 it, she can address it. If she can't, then she
16 can't. So I'm asking what she knows. And if she
17 doesn't know it, then that's fine.

18 MR. ROPER: I also know we've been
19 going about an hour. I'd love a break, when
20 there's a good time for it.

21 MS. REWARI: Okay. Well, I'm almost
22 there, so...

1 Q So do you know which grades Harry
2 Jackson's children are?

3 A I do not know what grade Harry
4 Jackson's children are, K through 8.

5 Q And I apologize if you already answered
6 it. Do you know what grade Mr. Verma's children
7 are in?

8 A I do not know what grade Mr. Verma's
9 children are in.

10 Q Okay. Great.

11 MS. REWARI: We can take a break.

12 (Recess taken from 10:01 a.m. to
13 10:07 a.m.)

14 MR. ROPER: So, are we back?

15 MS. REWARI: Back.

16 BY MS. REWARI:

17 Q You're still under oath.

18 Mr. Roper tells me you wanted to
19 clarify your answer to one of the questions I
20 asked before, regarding who was present when you
21 met with him to prepare.

22 Was there someone other than Mr. Roper

1 A We can say that, yeah.

2 Q So how many general members does the
3 Coalition for TJ have?

4 A I haven't checked our count but we have
5 about -- we have over 200.

6 Q And where is that count kept?

7 A That is kept in our Telegram channel.

8 Q How is it kept?

9 MR. ROPER: Objection to form.

10 A So, as we mentioned earlier, we have a
11 Google form that individuals fill out to become
12 members of Coalition for TJ, and we simply ask
13 name, you know, affiliation to TJ, phone number,
14 email address. And then that individual can
15 become a member and join our Telegram channel.
16 And then in that Telegram channel, we have, you
17 know, robust conversations and education and
18 engagement with our members.

19 Q Okay. So does the Coalition for TJ
20 keep a list of the general membership separate
21 from the list of names that are on the Telegram
22 chat?

1 community (100-120 members) and the Chinese
2 community (70-80 non-paying members)."

3 So what does it mean to have
4 "non-paying" -- what does "non-paying members,"
5 here mean?

6 A So at that time, there were, you know,
7 community members that would donate to the efforts
8 to try to support this community organizing. And
9 so that's what it's referencing.

10 Q So "non-paying members" means
11 non-donating members; is that right?

12 A Yes.

13 Q And does the Coalition for TJ collect
14 dues?

15 A No.

16 Q Does it collect a membership
17 application fee?

18 A No.

19 Q So what are these donations to?

20 A They were donations that were being
21 raised to support any activities that were being
22 done in support of the organization.

1 A Advocating for public policy decisions
2 by political individuals.

3 (Coalition Exhibit 4 marked for
4 identification and attached to the transcript.)

5 Q The court reporter's just handed you
6 what we've marked as Exhibit 4.

7 Is this the contact form that you were
8 discussing earlier, that is on the Coalition for
9 TJ website?

10 A I did not discuss a contact form
11 earlier. I discussed a membership form earlier.

12 Q Okay.

13 A And so this is a contact form.

Q Is there a separate membership form?

15 A I believe this is also the membership
16 form.

17 Q Okay. I'll give you a moment to look
18 through it, if you need to.

19 If you go back to Exhibit 2, which is
20 your declaration, the declaration of Asra Nomani,
21 and take a look at paragraph 17.

22 All right.

1 Q And it says there "To become a member,
2 interested individuals must fill out a membership
3 application form on the 'Contact Us' tab of the
4 Coalition for TJ website."

5 A Correct.

6 Q Do you see that?

7 A Yeah.

8 Q And so is what we're looking at, here
9 in Exhibit 4, the form you're referring to in your
10 declaration in paragraph 17?

11 A Yes. The confusion is because, as I
12 stated in here, the 17 talks about the Contact Us
13 tab and the printout you gave me is a printout.
14 So I don't know what tab you hit for this.

15 Q Okay. But we can --

16 A What you've given me is the sheet, the
17 web page.

18 Q Sure. And we'll go back to the website
19 on Mr. Stefany's computer and you can tell us
20 whether it looks any different.

21 MS. REWARI: You can pass her the
22 computer.

1 A Yes, I can see it.

2 Q Go ahead and scroll down and tell me if
3 you see anything different on this page than what
4 is on the printout.

5 A It is correct. And now that I've seen
6 that you've hit the Contact Us page to get to this
7 page, then I can confirm that it is the membership
8 application form that I'm referring to in sentence
9 [sic] 17.

10 Q Okay. So where, on this document, does
11 it say membership application?

12 A Well, as you can see, it does not state
13 that on the actual form.

14 Q Okay. Does it say anywhere on this
15 form that by filling out this form, a person is
16 applying to become a member of the Coalition for
17 TJ?

18 A Well, we state here, please share your
19 personal story about why the issue of advocating
20 or diversity in excellence is important to you.
21 And so we intentionally put that in there because
22 we wanted to make it clear that when you're

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1 signing up to this part of the form, you are
2 signing up for our organization. If you observe
3 the second item, it's "What programs are you
4 interested in working with?" And so it's from
5 that answer that we were, then, able to identify
6 volunteers who would be able to work on our
7 sub-teams, or if they wished to work on our
8 leadership team, they could.

9 If you will notice on the page that
10 there is a separate button that says "sign up for
11 regular updates." So the sign up for regular
12 updates is different, you know, and not the same.

13 Q Okay. You'd agree with me the word
14 "membership" doesn't appear anywhere in this
15 document, right?

16 A Yeah.

17 Q Except where it says "we are parents,
18 students, and community members"?

19 A Yes.

20 Q Okay. Does it say anywhere in this
21 form what the criteria are for membership?

22 A It does not state anywhere on the form

1 the criteria for membership because we simply saw
2 it, as you can see there, the testimonial about
3 why advocating for diversity and excellence is
4 important to the individuals filling out the form.

5 Q Okay. Are there criteria for
6 membership?

7 A Support in the mission.

8 Q So what does that mean?

9 A So we have the form right there, that
10 says please share your personal story about why
11 the issue of advocating for diversity and
12 excellence is important to you. So membership in
13 our organization hinged on supporting the mission
14 of the organization.

15 Q So are these forms reviewed by someone
16 within Coalition for TJ?

17 A Yes. The membership team reviews these
18 forms.

19 Q Okay. And do they have any rules as to
20 what they're looking for in the form in order to
21 determine that it satisfies the criteria you were
22 just talking about?

1 MR. ROPER: Objection to form.

2 A What they are seeking is -- what
3 they're seeking is people who support the mission
4 of advocating for diversity and excellence.

5 We did have a couple criteria that we
6 discussed, as a leadership team, and one was that
7 we did not want to have minor children involved in
8 the membership because we did not think that that
9 was appropriate.

10 We had a school board member from
11 Loudoun County who filled out a form and we
12 decided that it wasn't appropriate, also, to have
13 an elected official in our membership group.

14 Q Do you have to reside in Virginia to be
15 a member?

16 A You do not have to reside in Virginia
17 to be a member.

18 Q Do you have to have children eligible
19 to attend TJ to be a member?

20 A You do not have to have children.

21 Q Okay. And do you have members -- does
22 the Coalition for TJ have members who don't reside

1 in Virginia?

2 A Really, among our group of 200-some,
3 they -- they all -- I can't say all, but they -- I
4 would say all live in Virginia. We do not -- I
5 cannot think of anybody who doesn't. They're all
6 people engaged in the community and participate in
7 our local activities.

8 Q Okay. And do you have to -- well, do
9 you know what percentage of the general membership
10 has children in FCPS?

11 A I would say, you know --

12 MR. ROPER: Objection. Calls for
13 speculation.

14 Q Do you know? I'm not asking you to
15 guess. Do you know?

16 A No, I don't know.

17 Q Is that something you track, the
18 coalition tracks?

19 A Not specifically have it. But I would
20 definitely say that most have children in FCPS.
21 The reason I was hesitating is, like myself, I'm
22 an alumni parent now.

1 Q So there's nothing on this form that
2 requires you to identify whether you have
3 children, correct?

4 A Right.

5 Q And there's nothing in this form that
6 requires you to provide your home address or
7 business address, correct?

8 A Correct.

9 Q Doesn't even ask for a phone number,
10 correct?

11 A Does not.

12 Q Okay. And so, there's nothing in here
13 that is limited to parents of students at
14 particular middle schools, correct?

15 A There's nothing in the form that limits
16 membership to parents of students of particular
17 middle schools.

18 Q How does a person who fills out one of
19 these forms learn whether he or she has been
20 accepted as a member?

21 A They have an email address of the
22 contact and then they get added to the Telegram

1 chat channel.

2 Q Okay. Do they receive notification any
3 other way?

4 A No.

5 Q What are the benefits of membership?

6 A The benefits of membership is getting
7 educated about policies that are occurring, policy
8 changes, get educated about relevant news to the
9 issues of advanced academics in Fairfax County
10 Public Schools. You get access to our own work
11 related to the email addresses of school board
12 members so you can have it all in one place. We
13 put it together. You get updates about news
14 events that have been occurring related to these
15 issues.

16 Q So other than a Telegram chat
17 invitation, what do members receive from the
18 Coalition for TJ?

19 MR. ROPER: Objection to form.

20 A We have a newsletter.

21 Q How often is that newsletter published?

22 A We publish it as news occurs. So we

1 have at least one update a month.

2 Q Okay. And is that newsletter sent
3 electronically?

4 A It is.

5 Q Do you know whether those newsletters
6 have been produced in this case?

7 A In this case?

8 Q Uh-huh.

9 A What do you mean "in this case"?

10 Q In this lawsuit, have copies of those
11 newsletters been produced?

12 A I think they would have been because
13 they were part of our email production. I mean,
14 you'll have to check, but...

15 Q And you say these go out every month?

16 A I didn't say every month. I said, you
17 know, they were not regular, but they are about
18 monthly.

19 Q And when did the newsletters start
20 getting published?

21 A They're published through Mailchimp and
22 we -- a free newsletter platform. And we started

1 our Mailchimp account in September 2020.

2 Q Do you know approximately how many of
3 those newsletters have been sent since
4 September 2020?

5 A Probably -- probably at least a dozen.

6 Q Okay. So Telegram chat, newsletter.
7 Are there any other communications or hallmarks of
8 membership that you provide to people who have
9 been accepted as members?

10 MR. ROPER: Objection to form.

11 A We have our email -- we have emails
12 that go out, just email communications. We've had
13 regular webinars and Zoom meetings that have been
14 public engagement with the community in education.

15 Q Do you have to be a member to attend
16 those?

17 A No. We do keep our events open to the
18 public.

19 Q Okay.

20 A But members get notification.

21 We have had community discussions and
22 debates. We hosted a debate with our gubernatorial

1 candidates and the lieutenant gubernatorial, the
2 lieutenant governor candidate. We have had
3 wonderful education seminars related to the issue
4 of advanced academics.

5 Q And of those events that you just
6 listed, which ones were limited to only members of
7 the Coalition for TJ?

8 A Well, we prided ourselves in making all
9 of our events open to the public. We would have,
10 you know, sometimes limited public advertising of
11 events because, for example, Zoom only allows a
12 certain number of participants. And so we don't
13 want to have such a flight of engagement that we
14 wouldn't be able to accommodate the people who are
15 interested. So sometimes we would just send it to
16 an email list of our members or through our
17 Mailchimp, which would just be our subscribers,
18 instead of on social media channels, for example,
19 which would open it up to more people.

20 Q And members who receive those email
21 invitations can forward it to nonmembers, right?

22 A They can.

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1 Q And nonmembers can come and attend
2 these public events, right?

3 A Yes.

4 Q Can members leave the Coalition for TJ?

5 A Absolutely members can leave the
6 Coalition for TJ.

7 Q And what does a member have to do to
8 leave the Coalition for TJ?

9 A Well, you have power in Telegram, for
10 example, to simply leave the group. And so, you
11 have your own sort of agency in being able to do
12 that. And so people can leave the group and then
13 they are then not part of our communications
14 channel, and they can unsubscribe, for example, to
15 our newsletter.

16 And so, we have had people, in fact,
17 leave our membership organization.

18 Q And when a person leaves the Coalition
19 for TJ, are those two means, that you just
20 identified, how it's recorded; they unsubscribe to
21 emails and they remove themselves from the
22 Telegram chat?

1 of the Coalition for TJ, besides Mr. Jackson?

2 A I don't ask people's race.

3 Q Okay. So you don't know? The
4 coalition doesn't -- it does not collect racial
5 information?

6 A We do not collect racial information
7 about our members at Coalition for TJ.

8 Q Okay. Does the Coalition for TJ have
9 an operating budget?

10 A The Coalition for TJ does not have an
11 operating budget.

12 Q Does it have a bank account?

13 A The Coalition for TJ does not have a
14 bank account.

15 Q Has the Coalition for TJ engaged any
16 vendors?

17 MR. ROPER: Objection to form.

18 A The Coalition for TJ has not engaged
19 with vendors.

20 Q Has it ever made any expenditures?

21 A The Coalition for TJ, as I mentioned
22 earlier, was a program, a fiscally sponsored

1 people who had signed up for communications from
2 Coalition for TJ.

3 Q And what was the purpose of this email?

4 A So the purpose of the email was to
5 reach out to our supporters so that they could
6 then support the efforts that we were supporting,
7 along with Coalition for Diversity and Excellence
8 in Education.

9 Q And so, who was -- for whose benefit
10 was the Coalition for TJ collecting these funds in
11 this letter?

12 MR. ROPER: Objection to form.

13 A For the community's benefit.

14 Q Okay. And so in the last paragraph,
15 where it says "Please donate generously to this
16 cause to save TJ. Send your donation to the
17 Coalition for Diversity and Excellence in
18 Education."

19 So is it fair to say that Coalition for
20 TJ was fundraising for this other organization,
21 Coalition for Diversity and Excellence in
22 Education?

1 A Yes. We were raising funds from among
2 our supporters to work with our partner group
3 here, Coalition for Diversity and Excellence in
4 Education.

5 Q And where in this letter does it say
6 this was a partner group, as you've just described
7 it?

8 MR. ROPER: Objection to form.

9 A I think it's obvious.

10 Q Well, okay. So would it be fair to say
11 it doesn't say that explicitly in here, that it's
12 a partner group?

13 A Well, it says "Send your donation to
14 the Coalition for Diversity and Excellence in
15 Education." So it states clearly that, you know,
16 we are working together for anybody who would be
17 reading it explicitly.

18 Q Okay. So in the paragraph above, it
19 says "We are preparing for the next round of
20 battle. We are raising funds to hire lawyers,
21 lobbyists, educational specialists and advocacy
22 professionals," correct, that's what it says?

1 A Yes.

2 Q Did the Coalition for TJ hire lawyers,
3 other than ones you've just talked about, who
4 brought the KC v. Fairfax County School Board
5 case?

6 A No. We only hired those lawyers.

7 Q Okay. And did the Coalition for TJ
8 hire lobbyists?

9 A No.

10 Q Did it hire any educational
11 specialists?

12 A No.

13 Q Did it hire any advocacy professionals?

14 A No. So the Coalition for TJ did not
15 hire any lobbyists, educational specialists or
16 advocacy professionals.

17 Q In that paragraph, it says "Our goal:
18 To raise \$150,000 so we can wage a full-court
19 press through the next legislative session of the
20 Virginia General Assembly."

21 Did the Coalition for TJ meet that
22 goal?

1 A It went through, as you can say -- see,
2 it was with Coalition for Diversity and Excellence
3 in Education. So we met that goal, yes.

4 Q Does the Coalition for Diversity and
5 Excellence in Education file tax returns?

6 MR. ROPER: Objection to form. And
7 this goes beyond the scope of the 30(b)(6).

8 MS. REWARI: She can answer in her
9 individual capacity.

10 Q Do you know?

11 MR. ROPER: If you know.

12 A I don't know.

13 Q So, here, at the bottom of this
14 document, where it says "Donate today via PayPal."

15 A Yes.

16 Q Who has access to that PayPal account?

17 MR. ROPER: Objection to form. Goes
18 beyond the 30(b)(6).

19 You can answer, if you can.

20 MS. REWARI: It's topic 7, Plaintiff's
21 finances. This is fundraising that the coalition
22 is doing.

1 Q You can answer.

2 A The Coalition for Diversity and
3 Excellence in Education because, as you can see,
4 the email address is coalitiondee@yahoo.com.
5 That's that organization's email address.

6 Q And so who are the individuals that
7 have access to that email address?

8 MR. ROPER: Same objections to form.
9 And goes beyond the scope of the 30(b) (6).

10 A Yeah. I do not have that.

11 Q Did the Coalition for TJ get a
12 statement from the Coalition for Diversity and
13 Excellence in Education about how much was raised
14 through this means?

15 A We got updates.

16 Q Okay. And how were those updates
17 provided?

18 A At our -- they were provided verbally,
19 usually.

20 Q Okay. So how much was raised through
21 this effort, to the Coalition for TJ's knowledge?

22 A About \$150,000. But I'm not specific.

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1 30 (b) (6) .

2 A It's what I stated, also, earlier, that
3 the benefit would be that you're independent then.

4 Q Once the Coalition for TJ became a
5 fiscally sponsored program of United Charitable,
6 how did its fundraising activities change?

7 MR. ROPER: Objection to form.

8 A So our -- we just simply stated that
9 donations were possible, now, through the United
10 Charitable portal.

11 Q Okay. And so when the -- when a person
12 then donated through that, where would the money
13 go as it pertains to Coalition for TJ?

14 A To United Charitable.

15 Q And did, then, Coalition for TJ receive
16 money from United Charitable?

17 A Yes.

18 Q Did United Charitable receive -- strike
19 that.

20 Does the fiscal sponsorship of United
21 Charitable mean that they have -- that entity has
22 some say in the operations of Coalition for TJ?

1 public that funds would go -- donated funds would
2 go to United Charitable programs?

3 A It would have been immediate.

4 Q Okay. And so, does the coalition,
5 then, receive a monthly or regular financial
6 statements from United Charitable?

7 MR. ROPER: Objection to form.

8 A It was regular.

9 Q And did there come a time where
10 Coalition for TJ stopped receiving monthly or
11 regular financial statements from United
12 Charitable?

13 A Coalition for TJ is not a program, any
14 longer, of United Charitable.

15 Q And what does that mean? What do you
16 mean by that?

17 A Well, as I stated earlier, United
18 Charitable does not allow litigation. And so once
19 it became clear that we were going to participate
20 in this litigation against Fairfax County Public
21 Schools, we separated from coalition -- United
22 Charitable as a program, and we are no longer a

1 program of United Charitable.

2 Q Does your website, the Coalition for TJ
3 website, still have a donate page, a donate link
4 on its website?

5 A So the donations go to a new program
6 that's called Coalition for Truth and Justice.

7 Q And what is that?

8 A That is an entity we have that has
9 adopted, you know, the ideas of promoting truth
10 and justice in our community and advocating, also,
11 for diversity and excellence in education,
12 consistent with the mission.

13 Q What is the difference between that
14 organization and the Coalition for TJ, in terms of
15 who -- strike that.

16 Who operates Coalition for Truth and
17 Justice?

18 MR. ROPER: Objection to form. Beyond
19 the scope of the 30(b) (6).

20 A So I'm the program manager of it.

21 Q Is there anybody else that's involved?

22 MR. ROPER: Same objections.

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1 MR. ROPER: Objection to form.

2 A A decision had been made, yeah.

3 Q Are there any agenda or topics that are
4 circulated for discussion in the Telegram chat or
5 can you talk about anything?

6 A Yeah, we can talk about anything. I
7 mean, mostly people understand what our mission is
8 and so we stick to that area.

9 Q What about the leadership team? Are
10 there agendas for meetings?

11 A Well, we found that we didn't need to
12 have agendas because, as I mentioned earlier, you
13 know, we're all working professionals and parents,
14 and so we're pretty focused on what we need to get
15 done. And so we have it in the top of our mind
16 and we don't have to go through the formality of
17 writing an agenda down. At the beginning, we did
18 have an agenda or two but found we didn't need it
19 in order to do our business.

20 Q Is there a minimum number of leadership
21 team members that have to be participating in
22 order for there to be a leadership team meeting?

1 United Charitable?

2 A Yeah, we filled out the application
3 form that I mentioned to you. We included in it
4 our mission, our activities, our goals, our, you
5 know, organizational decision-making structure,
6 what we hoped to do in the community.

7 And you can see here, very clearly,
8 that we identified our program activities, conduct
9 original research, journalism and advocacy about
10 significant public issues related to education,
11 contribute to sound public policy decisions and
12 protect gifted and STEM education and the legal
13 defense of the rights of students.

14 Q I think you said "related," but I'm
15 reading relegated to education.

16 A Thank you. Relegated, yeah.

17 Q Okay. Doesn't say anything about TJ
18 admissions in here, right?

19 A It says "protect gifted and STEM
20 education."

21 Q So the mission stated here is different
22 than the mission that's on the website that we

1 admitted based on their race, to TJ?

2 MR. ROPER: Objection. Beyond the
3 scope of her 30(b) (6) designation. And it calls
4 for a legal conclusion.

5 A As I state here, the schools had
6 rejiggered the process to make race a factor in
7 the decision.

8 Q So I'm asking what you mean by that.

9 A Simply that they have made race a
10 factor in the decisions.

11 Q And are you saying that students are
12 admitted on the basis of their race?

13 MR. ROPER: Objection. Beyond the
14 scope of her 30(b) (6) designation. Asked and
15 answered. And object to the form.

16 A I state clearly here that the school
17 has rejiggered the process to make race a factor
18 in the decisions.

19 Q Can you identify a single student who
20 wasn't admitted on the basis of their race, to TJ,
21 in this last round of admissions?

22 MR. ROPER: Objection. Beyond the

1 scope of the 30(b) (6) designation.

2 A I'm not privy to the race of students.

3 Q Okay.

4 MS. REWARI: I think these are all the
5 topics that I have -- or questions that I have for
6 Ms. Nomani. So we can take a lunch break and then
7 come back for the rest of the topics.

8 MR. ROPER: So I have a few follow-ups
9 for her. It may make sense to do those now before
10 we switch witnesses.

11 MS. REWARI: All right.

12 EXAMINATION BY COUNSEL FOR THE PLAINTIFF
13 BY MR. ROPER:

14 Q All right. Thank you, Ms. Nomani.

15 If you could, pull out
16 Exhibit Number 3, if you can find that in your
17 pile. This is the exhibit that includes a listing
18 of different numbers. Let's see if I can find it.

19 Is it fair to say, in that listing of
20 the core team, is it fair to say that all of the
21 members of the core team support the mission of
22 the Coalition for TJ?

Conducted on October 18, 2021

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1 CERTIFICATE OF REPORTER - NOTARY PUBLIC

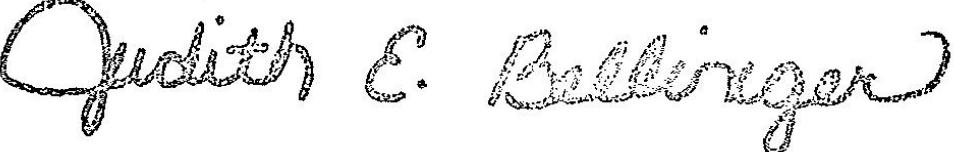
2 I, JUDITH E. BELLINGER, RPR, CRR, the
3 officer before whom the foregoing deposition was
4 taken, do hereby certify that the foregoing
5 transcript is a true and correct record of the
6 testimony given; that said testimony was taken by
7 me and thereafter reduced to typewriting under my
8 direction; that reading and signing was not
9 requested; and that I am neither counsel for,
10 related to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set
14 my hand and affixed my notarial seal this 5th day
15 of November, 2021.

16 My Commission Expires: September 30, 2024

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19 
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21 NOTARY PUBLIC IN AND FOR

22 THE COMMONWEALTH OF VIRGINIA